

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

LG DISPLAY CO., LTD.,)	
)	
Plaintiff,)	Civil Action No. 06-726 (JJF)
)	Civil Action No. 07-357 (JJF)
v.)	
CHI MEI OPTOELECTRONICS)	CONSOLIDATED CASES
CORPORATION, et al.)	
Defendants.)	
)	

**DECLARATION OF RUNG-NAN LU IN SUPPORT OF DEFENDANT CHI MEI
OPTOELECTRONICS CORPORATION'S OPPOSITION TO PLAINTIFF'S
MOTION FOR LEAVE TO FILE A SECOND AMENDED ANSWER**

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Dated: July 18, 2008

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I, Rung-Nan Lu, declare as follows:

1. I make this Declaration in support of Chi Mei Optoelectronics Corporation's Opposition to Plaintiff LG Display's Motion for Leave to File a Second Amended Answer. The statements made in this Declaration are based on my own personal knowledge, and if called as a witness, I could and would testify competently to thereto.

2. I am the Manager of the Array/Cell Design Department of the Product & Material Engineering Division at Chi Mei Optoelectronics Corporation ("Chi Mei"). I have over 9 years of experience in the design, manufacturing, and analysis of liquid crystal display ("LCD") devices, including the electronic circuitry used in such devices. As part of my regular responsibilities, I supervise and instruct others in the design,

manufacturing, and analysis of LCD devices. I am also familiar with the tools used to analyze LCD circuitry at the microscopic level.

3. I am informed that the general subject matter and the claims of United States Patent No. 6,664,569 (the '569 patent), particularly claim 25 and its dependent claims, relate to an array substrate for use in a thin-film-transistor liquid crystal display device. For example, I am informed that claim 25 of the '569 patent involves a specific arrangement of features in an LCD array substrate, including a gate line, a gate electrode, an insulating layer, a semiconductor layer, a data line, a drain electrode, and a source electrode.

4. The above-described features listed in claim 25 of the '569 patent and their specific configuration and arrangement would be readily observable using an optical microscope. In my experience, it is a matter of routine practice to be able to view and measure these features of an LCD device using such a microscope. In fact, entry-level engineers with only six months of work experience with thin-film-transistors are able to conduct this analysis in a few minutes.

5. Although the above-described features listed in claim 25 are readily observable using an optical microscope, additional detailed information about the LCD array substrate can also be obtained by using a more sophisticated lab instrument that I would expect LG Display Co., Ltd. ("LGD") to have as part of its day to day operations. This instrument is known as a scanning electron microscope ("SEM") and is an electron-beam-based microscope that uses electrons to produce high-resolution three dimensional images of specimens. Large manufacturers of LCD devices, such as LGD, normally have access to an SEM to analyze their own products for research purposes or quality analysis.

In any event, LGD could have, but need not have, used an SEM to confirm the presence or absence of the above-described features listed in claim 25, including the specific configuration and arrangement of these features. An optical microscope would have been sufficient.

Executed on July 18, 2008, in Tainan, Taiwan.

I declare under penalty of perjury under the laws of the United States of America and the State of Delaware that the foregoing is true and correct.



Rung-Nan Lu

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

CERTIFICATE OF SERVICE

I, Philip A. Rovner, hereby certify that on July 18, 2008, the within document was filed with the Clerk of the Court using CM/ECF which will send notification of such filing(s) to the following; that the document was served on the following counsel as indicated; and that the document is available for viewing and downloading from CM/ECF.

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I hereby certify that on July 18, 2008 I have sent by E-mail the foregoing document to the following non-registered participants:

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